

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 18-14404-pmm  
RUBY DELGADO and :  
CARLOS R. JIMENEZ, : Chapter 13  
Debtors. :

**DEBTORS' RESPONSE TO MOTION OF THE MONEY SOURCE, INC  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW come the Debtors, by and through their attorney, Stephen M. Otto, Esquire, and  
file the within Response, of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. The Mortgage was not in default, i.e., the mortgage had not been accelerated,  
as of the Petition Date. The purpose of the Chapter 13 filing was to address Debtors'  
unsecured debt and auto-related debt.
6. Admitted on part and Denied in part. Debtors admit to having missed one or more  
payments. Debtors are without knowledge or information regarding the precise  
amount of the default.
7. Admitted on part and Denied in part. Debtors admit to having missed one or more  
payments. Debtors are without knowledge or information regarding the precise  
amount of the default.
8. Movant's averment is a legal conclusion to which no response is necessary.
9. Movant's averment is a legal conclusion to which no response is necessary.

WHEREFORE, Debtors respectfully request that the Motion be denied.

Respectfully submitted,  
LAW OFFICE OF STEPHEN M. OTTO, LLC

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